**Commonwealth of Kentucky**
**Environmental and Public Protection Cabinet**
**Department for Environmental Protection**
**Division for Air Quality**
**803 Schenkel Lane**
**Frankfort, Kentucky 40601**
**(502) 573-3382**

**Draft**

# AIR QUALITY PERMIT

**Issued under 401 KAR 52:020**

| | |
|---|---|
| **Permittee Name:** | **Carpenter Company** |
| **Mailing Address:** | **P.O. Box 190**<br>**Russellville, KY 42276-0190** |
| **Source Name:** | **same as above** |
| **Mailing Address:** | **same as above** |
| **Source Location:** | **200 Forrest Park Drive**<br>**Russellville, KY 42276** |
| **Permit Number:** | **V-06-028** |
| **Source A. I. #:** | **2751** |
| **Activity #:** | **APE20050001** |
| **Review Type:** | **Operation** |
| **Source ID #:** | **21-141-00012** |
| **Regional Office:** | **Bowling Green Regional Office**<br>**1508 Western Avenue**<br>**Bowling Green, KY 42104-3356**<br>**(270) 746-7475** |
| **County:** | **Logan** |
| **Application Complete Date:** | **May 21, 2005** |
| **Issuance Date:** | |
| **Revision Date:** | |
| **Expiration Date:** | |

**John S. Lyons, Director**
**Division for Air Quality**

*Revised 12/09/02*

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| | Permit type | Log or Activity# | Complete Date | Issuance Date | Summary of Action |
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| **V-06-028** | **Initial Issuance** | **APE20050001** | **5/21/05** | **initial** | **Initial Sourcewide Permit** |

## SECTION A - PERMIT AUTHORIZATION

Pursuant to a duly submitted application the Kentucky Division for Air Quality hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first submitting a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in 401 KAR 52:020, Title V Permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by this Cabinet or any other federal, state, or local agency.

# SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

## Slabstock flexible polyurethane foam production line

**EP01 (EU-01) Virgin Foam Line**
**EP02 (EU-02) Slabstock Curing**

**Description:** Includes all portions of the flexible polyurethane foam line; transfer of raw materials, all connectors, valves, storage tanks, pumps and other leak components in diisocyanate service, and the foam line itself to the point in the process where the foam is completely cured.

| | |
|---|---|
| Construction commenced: | 1969, (modified 1999) |
| Control Equipment: | No control equipment on slabstock production line;<br>Carbon adsorption system for diisocyanate storage vessels;<br>Sealed pumps in diisocyanate service. |

**APPLICABLE REGULATIONS:** None

**1. Operating Limitations:**

A. The usage rate of all VOC and HAP containing materials shall be restricted so the emission limitations as set forth in Section D of this permit are not exceeded.
B. See Group Requirements for Components in Diisocyanate Service.

**2. Emission Limitations:**

A. There are no VOC or HAP emission limitations for the individual affected facilities. Emission limitations are source wide, as given in Section D of this permit.
B. See Group Requirements for Components in Diisocyanate Service.

**3. Testing Requirements:** Within 6 months of issuance of the final permit the source will perform stack testing using EPA's Method 25A or a Division approved alternative method to demonstrate that the source is capable of complying with the source wide HAP emission limitations at all times. The performance test shall be conducted under normal conditions that are representative of the source's operations and create the highest rate of emissions. To ascertain that emissions measured during the stack test are the total emissions from the affected facility, the permittee shall conduct capture efficiency testing of the foam tunnel using EPA's Method 204. For this purpose the permittee shall construct a Temporary Total Enclosure if the existing foam tunnel does not meet the definition of a permanent total enclosure as defined by Method 204.

**4. Specific Monitoring Requirements:** See Group Requirements for Components in Diisocyanate Service.

**5. Specific Recordkeeping Requirements:** The permittee shall keep records of the amount of VOC and HAP containing materials used each month. Once each month, the permittee shall calculate and record the VOC and HAP emitted from the virgin foam line during the given month and new source-wide 12-month rolling totals as required by Section D of this permit.

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

**Slabstock flexible polyurethane foam production line**

**6.** **Specific Reporting Requirements:** The permittee shall report VOC and HAP emissions as part of the semiannual reporting as required in Section F (5) & (6) of this permit.

**7.** **Specific Control Equipment Operating Conditions:** None

**8.** **Alternate Operating Scenarios:** None

# SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

## Rebond Foam Production Line

**EP03 (EU-03) Continuous Bonded Foam Line**

**Description:** Trim from slabstock production is ground to small pieces that are bonded together.

**Scrape Grinding System** including; (1) Shredder, (2) Granulators, (1) Elutriator, (5) Storage Silos, (1) Surge Bin and Pneumatic Conveying

**Rebond Production** including; (1) Dry Mixer, (1) Wet Mixer, (1) Molding Unit, plus all connectors, valves, storage tanks, pumps and other leak components in diisocyanate service

| | |
|---|---|
| Maximum Continuous Rating: | Polyurethane 18,000 lbs/hr |
| Construction commenced: | 1975 |
| Control Equipment: | Cyclones and Baghouses for control of particulates from granulators, shedders, and storage bins;<br>No control for Rebond Molding Unit or Slab Curing.<br>Carbon adsorption system for diisocyanate storage vessels;<br>Sealed pumps in diisocyanate service. |

**APPLICABLE REGULATIONS:**

**401 KAR 59:010—New process operations;** applicable to each affected facility associated with a process operation which is not subject to another emission standard with respect to particulates in Chapter 59 of 401 KAR commenced on or after July 2, 1975.

**1. Operating Limitations:**

A. The usage rate of all VOC and HAP containing materials shall be restricted so the emission limitations as set forth in Section D of this permit are not exceeded.

B. See Group Requirements for Components in Diisocyanate Service.

**2. Emission Limitations:**

A. 401 KAR 59:010, § 3(1)(a), Visible emissions shall not equal or exceed 20% opacity.

**Compliance Demonstration Method:** See **4. Specific Monitoring Requirements** and **5. Specific Recordkeeping Requirements**

B. 401 KAR 59:010, § 3(2)(a), Particulate emissions shall not equal or exceed the emission rate determined by the following equation:

$$E = 3.59 \times P^{0.62}$$

Where,

E = Emission rate in pounds per hour, (lbs/hr)

P = Process weight rate in tons per hour of material shred, (tons/hr)

For processing rates of 1000 lbs/hr or less, the allowable emission rate is 2.34 lbs/hr.

**Compliance Demonstration Method:** See **4. Specific Monitoring Requirements** and **5. Specific Recordkeeping Requirements**

# SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

## Rebond Foam Production Line

**2. Emission Limitations: (continued)**

C. There are no VOC or HAP emission limitations for the individual affected facilities. Emission limitations are source wide, as given in Section D of this permit.

D. See Group Requirements for Components in Diisocyanate Service.

**3. Testing Requirements:** Within 6 months of issuance of the final permit the source will perform stack testing using EPA's Method 25A or a Division approved alternative method to demonstrate that the source is capable of complying with the source wide HAP emission limitations at all times. The performance test shall be conducted under normal conditions that are representative of the source's operations and create the highest rate of emissions. To ascertain that emissions measured during the stack test are the total emissions from the affected facility, the permittee shall conduct capture efficiency testing of the rebond foam tunnel using EPA's Method 204. For this purpose the permittee shall construct a Temporary Total Enclosure if the existing foam tunnel does not meet the definition of a permanent total enclosure as defined by Method 204.

**4. Specific Monitoring Requirements:**

A. The permittee shall perform a qualitative visual inspection for emissions from the Surge Bin Cyclone, Holding Bin Cyclone and associated pneumatic conveying ducts that are located outside of any building enclosure at least once per operating month and maintain a log of the observations. If visible emissions are seen;

(1) The permittee shall initiate repairs to eliminate the visible emissions, or;

(2) Opacity of emissions shall be determined by Reference Method 9.

(i) If emissions are in excess of the applicable opacity limit, then the permittee shall initiate all necessary repairs to the equipment.

(ii) If emissions are not in excess of the applicable opacity limit then the permittee shall determine the opacity of emissions daily using Reference Method 9 for as long as cause or condition attributable for the visible emissions is present.

B. See Group Requirements for Components in Diisocyanate Service.

**5. Specific Recordkeeping Requirements:**

A. Monthly records shall be kept of all VOC and HAP containing material including diisocyanates, mold release agents and clean-up solvents used during the month. Record the type of material, the amount of each material used during a given month, and the VOC and HAP content of each material by weight percent.

B. Once each month, the permittee shall calculate and record the VOC and HAP emitted from rebond foam production line during the given month and new source-wide 12-month rolling totals as required by Section D of this permit.

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

**Rebond Foam Production Line**

**5. Specific Recordkeeping Requirements: (continued)**

C. The permittee shall maintain records of the following information for the particulate controls:

(1) The design and/or manufacturer's specifications.

(2) Operational procedures, preventive maintenance records, and records of any repairs made to the equipment.

(3) Records of Method 9 opacity readings as necessary including the date, time, and identity of the personnel making the observation. Should weather prohibit a Method 9 reading, this fact should also be noted.

**6. Specific Reporting Requirements:**

A. The permittee shall report VOC and HAP emissions as part of the semiannual reporting required by Section F (5) & (6) of this permit.

B. The permittee shall report visible emissions and actions taken when action is required by **4. Specific Monitoring Requirements:** A (1) or (2) above.

C. Copies of these records shall be submitted as a part of the semiannual reporting as required in Section F (5) & (6).

**7. Specific Control Equipment Operating Conditions:** None

**8. Alternate Operating Scenarios:** None

# SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

## Group Requirements for Components in Diisocyanate Service

**Description:** Includes storage tanks, valves, fittings, pumps and other leak components in diisocyanate service.

Control Equipment: None on slabstock or rebond production lines;
Carbon adsorption system for diisocyanate storage vessels;
Sealed pumps in diisocyanate service.

**APPLICABLE REGULATIONS:**

**401 KAR 50:012—General application;** All major air contaminant sources shall as a minimum apply control procedures that are reasonable, available, and practical.

**Compliance Demonstration Method:** The Cabinet has determined that the following control procedures and work practices are reasonable, available and practical. The source is assumed to be in compliance when operated according to the procedures as listed in Subsections 1 through 8 below.

**1. Operating Limitations:**

A. Diisocyanate storage vessels shall be equipped with a carbon adsorption system that routes displaced vapors through activated carbon before being discharged to the atmosphere. The owner or operator shall replace the existing carbon with fresh carbon upon indication of breakthrough before the next unloading event.

B. Transfer pumps in diisocyanate service. Each transfer pump in diisocyanate service shall meet the requirements of paragraph (B)(1) or (B)(2) of this section.

(1) The pump shall be a sealless pump; or

(2) The pump shall be a submerged pump system meeting the requirements in paragraphs (B)(2)(i) through (iii) of this section.

(i) The pump shall be completely immersed in bis(2-ethylhexyl)phthalate (DEHP, CAS #118–81–7), 2(methyloctyl)phthalate (DINP, CAS #68515–48–0), or another neutral oil.

(ii) The pump shall be visually monitored weekly to detect leaks,

(iii) When a leak is detected, it shall be repaired in accordance with the procedures in paragraphs (B)(2)(iii)(a) and (b) of this section, except as provided in paragraph (D) of this section.

a. The leak shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected.

b. A first attempt at repair shall be made no later than 5 calendar days after the leak is detected. First attempts at repair include, but are not limited to, the following practices where practicable:

1. Tightening of packing gland nuts.

2. Ensuring that the seal flush is operating at design pressure and temperature.

# SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

## Group Requirements for Components in Diisocyanate Service

**1. Operating Limitations: (Continued)**

C. Other components in diisocyanate service. If evidence of a leak is found by visual, audible, or any other detection method, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in paragraph (D) of this section. The first attempt at repair shall be made no later than 5 calendar days after each leak is detected.

D. Delay of repair.

(1) Delay of repair of equipment for which leaks have been detected is allowed for equipment that is isolated from the process and that does not remain in diisocyanate service.

(2) Delay of repair for valves and connectors is also allowed if:

(i) The owner or operator determines that diisocyanate emissions of purged material resulting from immediate repair are greater than the fugitive emissions likely to result from delay of repair, and

(ii) The purged material is collected and destroyed or recovered in a control device when repair procedures are effected.

(3) Delay of repair for pumps is also allowed if repair requires replacing the existing seal design with a sealless pump, and repair is completed as soon as practicable, but not later than 6 months after the leak was detected.

**2. Emission Limitations:**

There are no VOC or HAP emission limitations for the individual affected facilities. Emission limitations are source wide, as given in Section D of this permit.

**3. Testing Requirements:**

If deemed necessary, the Cabinet may require testing by using appropriate EPA Methods, at such times as maybe required by the Cabinet in accordance with Regulation 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 4.

**4. Specific Monitoring Requirements:**

A. The permittee shall monitor the concentration level of the HAP or the organic compounds in the exhaust vent stream (or outlet stream exhaust) from the carbon adsorption system at the frequency specified in (A)(1) or (2) of this section in accordance with either (A)(3) or (4) of this section.

(1) The concentration level of HAP or organic compounds shall be monitored during each unloading event, or once per month during an unloading event if multiple unloading events occur in a month.

(2) As an alternative to monthly monitoring, the owner or operator can set the monitoring frequency at an interval no greater than 20 percent of the carbon replacement interval, which is established using a design analysis described below in paragraphs (A)(2)(i) through (iii) of this section.

(i) The design analysis shall consider the vent stream composition, constituent concentration, flow rate, relative humidity, and temperature.

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

**Group Requirements for Components in Diisocyanate Service**

**4. Specific Monitoring Requirements: (Continued)**

(ii) The design analysis shall establish the outlet organic concentration level, the capacity of the carbon bed, and the working capacity of activated carbon used for the carbon bed, and

(iii) The design analysis shall establish the carbon replacement interval based on the total carbon working capacity of the carbon adsorption system and the schedule for filling the storage vessel.

(3) Measurements of HAP concentration shall be made using 40 CFR Part 60, appendix A, Method 18. The measurement shall be conducted over at least one 5-minute interval during which the storage vessel is being filled.

(4) Measurements of organic compounds shall be made using 40 CFR Part 60, Appendix A, Method 25A. The measurement shall be conducted over at least one 5-minute interval during which the storage vessel is being filled.

B. **Leak Inspection and Maintenance Plan:**

The permittee shall prepare and maintain a written leak inspection and maintenance plan to be implemented within 60 days of issuance of this permit that specifies:

(1) For all affected sources, a list of components in diisocyanate service.

(2) For transfer pumps in diisocyanate service, a record of the type of control utilized for each transfer pump and the date of installation.

(3) A systematic procedure for identifying leaks for all equipment in diisocyanate service;

(4) An inspection schedule with a minimum inspection frequency of:

(i) Weekly visual inspection for submerged pumps in diisocyanate service;

(ii) Quarterly for valves and other leak components.

(iii) Semi-annual for fittings

(5) Methods for documenting the date and results of each inspection and any repairs that were made;

(6) The time frame between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:

(i) A first attempt at repair shall be made no later than 5 calendar days after the leak is detected. First attempts at repair include, but are not limited to, the following practices where practicable:

a. Tightening of packing gland nuts.

b. Ensuring that the seal flush is operating at design pressure and temperature.

(ii) Final repairs shall be completed not later than 15 calendar days after a leak is detected.

(iii) Delay of repair of equipment for which leaks have been detected is allowed for equipment that is isolated from the process and that does not remain in diisocyanate service.

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

**Group Requirements for Components in Diisocyanate Service**

**4. Specific Monitoring Requirements: (Continued)**

B. **Leak Inspection and Maintenance Plan: (Continued)**

(iv) Delay of repair for valves and connectors is also allowed if:

a. The owner or operator determines that diisocyanate emissions of purged material resulting from immediate repair are greater than the fugitive emissions likely to result from delay of repair, and

b. The purged material is collected and destroyed or recovered in a control device when repair procedures are affected.

c. Delay of repair for pumps is also allowed if repair requires replacing the existing seal design with a sealless pump, and repair is completed as soon as practicable, but not later than 6 months after the leak was detected.

(7) To satisfy the requirements to provide a leak inspection and maintenance plan, the permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans, provided the alternative plans meet the requirements of this section.

(8) The permittee shall keep the written leak inspection and maintenance plan on record after it is developed to be made available for inspection, upon request, by the Division for the life of the affected source. In addition, if the leak inspection and maintenance plan is revised, the permittee shall keep previous (i.e. superseded) versions on record to be made available for inspection, upon request, by the Division for a period of 5 years after each revision to the plan.

**5. Specific Recordkeeping Requirements:**

A. Storage vessel records.

(1) A list of diisocyanate storage vessels, along with a record of the type of control utilized for each storage vessel.

(2) For storage vessels complying through the use of a carbon adsorption system, paragraph (A)(2)(i) or (ii), and paragraph (A)(3)(iii) of this section.

(i) Records of dates and times when the carbon adsorption system is monitored for carbon breakthrough and the monitoring device reading, when the device is monitored; or

(ii) For affected sources monitoring at an interval no greater than 20 percent of the carbon replacement interval, the records of the design analysis, including all the information listed in **4. Specific Monitoring Requirements**, (A)(2)(i) through (iii).

(iii) Date when the existing carbon in the carbon adsorption system is replaced with fresh carbon.

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

**Group Requirements for Components in Diisocyanate Service**

**5. Specific Recordkeeping Requirements: (Continued)**

B. Equipment leak records.

The information in paragraphs (B)(1) through (6) shall be recorded for leaking components.

(1) For all affected sources, a complete list of components in diisocyanate service.

(2) For transfer pumps in diisocyanate service, a record of the type of control utilized for each transfer pump and the date of installation.

(3) The instrument or method used to determine the leak.

(4) The date the leak was detected and the dates of each attempt to repair the leak.

(5) Repair methods applied in each attempt to repair the leak.

(6) The words ‘‘repair delayed’’ and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak.

(7) The expected date of the successful repair of the leak if a leak is not repaired within 15 calendar days.

(8) The date of successful repair of the leak.

**6. Specific Reporting Requirements:**

A. The permittee shall report any deviations from the permit conditions including;

(1) Any unloading events that occurred after carbon adsorption system breakthrough was detected and before the carbon was replaced.

(2) Any equipment leaks that were not repaired in accordance with the Leak Inspection and Maintenance Plan.

B. Information regarding deviations can be submitted as part of the semi-annual report required by Section F (6).

**7. Specific Control Equipment Operating Conditions:** None

**8. Alternate Operating Scenarios:** None

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

### EP05 (EU05) Fiber Operation, Adhesive Bonded Line

**Description:** Astec Machinery – Custom designed, (5) Bailed Fiber Openers w/ Dust Collector, Blender, (2) Carding Machines w/ Dust Collectors, Lappers, (2) Spray Stations w/ Mist Eliminators, (1) Drying Oven (6 MMBtu/hr), (2) Needle Looms, (2) Trim Knives and (1) Trim Re-grinder.

| | |
|---|---|
| Maximum continuous rating: | 250 lbs/hr resin use |
| Installed: | December 1995 |
| Control Equipment: | Mist Eliminators for Particulate Control from Adhesive Overspray / Dry Filters for Control of Polyester Fiber Duct. |

**APPLICABLE REGULATIONS:**

**401 KAR 59:010—New process operations;** applicable to each affected facility associated with a process operation which is not subject to another emission standard with respect to particulates in Chapter 59 of 401 KAR commenced on or after July 2, 1975.

**1. Operating Limitations:**

A. The usage rate of all VOC and HAP containing materials shall be restricted so the emission limitations as set forth in Section D of this permit are not exceeded.

B. The mist eliminators must be operated according to the manufacturer's specifications and recommendations at anytime a spray station is in use.

C. The dust collectors must be in place and operational anytime a Carding machine is in operation.

**2. Emission Limitations:**

A. There are no VOC or HAP emissions limitations for the individual affected facilities. Emission limitations are source wide, as given in Section D of this permit.

B. 401 KAR 59:010, § 3(1)(a), Visible emissions shall not equal or exceed 20% opacity.

**Compliance Demonstration Method:** The source is considered to be in compliance as all equipment exhausts inside of the building.

C. 401 KAR 59:010, § 3(2)(a), Particulate emissions shall not equal or exceed the emission rate determined by the following equation:

$$E = 3.59 \times P^{0.62}$$

Where,

E = Emission rate in pounds per hour

P = Process weight rate (Tons/Hr.) of material unloaded

For processing rates of 1000 lbs/hr or less, the allowable emission rate is 2.34 lbs/hr.

**Compliance Demonstration Method:** The source is considered to be in compliance as all equipment exhausts inside of the building.

**3. Testing Requirements:** If deemed necessary, the Cabinet may require testing by using appropriate EPA Methods, at such times as maybe required by the Cabinet in accordance with Regulation 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 4.

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

**EP05 (EU05) Fiber Operation, Adhesive Bonded Line**

**4. Specific Monitoring Requirements:**

A. The particulate filters shall be monitored once daily to determine the need for filter maintenance. The filters shall be serviced as recommended by the manufacturer.
   (1) For each filter associated with a Carding machine, anytime the given Carding machine operates during that 24-hour period.
   (2) For the filter associated with the Bailed Fiber openers, anytime the Bonded Line operates during that 24-hour period.

**5. Specific Recordkeeping Requirements:**

A. Monthly records should be kept of all adhesives, diluents, clean-up solutions, antimicrobial agents, additives, and other materials purchased and used during the month, along with the VOC and HAP content of each material used.
B. VOC and HAP emissions shall be calculated monthly per Section D of this permit, and every month, new 12-month rolling totals of VOC and HAP emissions shall be calculated.
C. The permittee shall maintain records of the following information for the particulate controls:
   (1) The design and/or manufacturer's specifications.
   (2) The operational procedures and preventive maintenance records.
   (3) The permittee shall maintain a log of the filter inspections and dates of filter replacements.
   (4) With each reading or observation above, note the time, date, and identity of the personnel making the record.
   (5) If a piece of equipment/filter is not in operation on a given day(s), this fact should also be noted in the log.

**6. Specific Reporting Requirements:** The permittee shall report VOC and HAP emissions as part of the semiannual reporting as required in Section F (5) & (6) of this permit.

**7. Specific Control Equipment Operating Conditions:** None

**8. Alternate Operating Scenarios:** None

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

### EP07 (EU07) Foam Fabrication - Spray Glue Gun Operation

**Description:** (30) Graco - 230-56X198A, spray guns
Maximum continuous rating: 281 lbs/hr
Installed: December 1969
Control Equipment: None

### EP08 (EU08) Slab Bonding - Spray Glue Gun Operation

**Description:** (8) Graco - Optimizer M-1265 HVLP, glue guns
Maximum continuous rating: 2.73 lbs/hr
Installed: December 1969
Control Equipment: None

**APPLICABLE REGULATIONS:**
**401 KAR 59:010—New process operations;** applicable to each affected facility associated with a process operation which is not subject to another emission standard with respect to particulates in Chapter 59 of 401 KAR commenced on or after July 2, 1975.

**1.** **Operating Limitations:** The usage rate of all VOC and HAP containing materials shall be restricted so the emission limitations as set forth in Section D of this permit are not exceeded.

**2.** **Emission Limitations:**

A. There are no individual VOC and HAP emission limits for the affected facilities. Emission limitations are source wide, as given in Section D of this permit.

B. 401 KAR 59:010, § 3(1)(a), Visible emissions shall not equal or exceed 20% opacity.
**Compliance Demonstration Method:** The source is considered to be in compliance as there are no exhaust streams from this process emitted directly to the ambient air.

C. 401 KAR 59:010, § 3(2)(a), Particulate emissions shall not equal or exceed the emission rate determined by the following equation:

$$E = 3.59 \times P^{0.62}$$

Where,
E = Emission rate in pounds per hour
P = Process weight rate (Tons/Hr.) of material unloaded
For processing rates of 1000 lbs/hr or less, the allowable emission rate is 2.34 lbs/hr.
**Compliance Demonstration Method:** The source is considered to be in compliance as there are no exhaust streams from this process emitted directly to the ambient air.

**3.** **Testing Requirements:** If deemed necessary, the Cabinet may require testing by using appropriate EPA Methods, at such times as maybe required by the Cabinet in accordance with Regulation 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 4.

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

**4.** **Specific Monitoring Requirements:** The permittee shall monitor adhesive usage for the purpose of demonstrating compliance with source wide emission limitations.

**5.** **Specific Recordkeeping Requirements:**

A. Monthly records should be kept of all VOC and HAP containing adhesives, diluents, clean-up solutions, antimicrobial agents and other additives used, including the type, amount, and the VOC and HAP content of each material by weight percent.

B. VOC and HAP emissions shall be calculated monthly per Section D of this permit, and every month, new 12-month rolling totals shall be calculated.

**6.** **Specific Reporting Requirements:** The permittee shall report VOC and HAP emissions as part of the semiannual reporting as required in Section F (5) & (6) of this permit.

**7.** **Specific Control Equipment Operating Conditions:** None

**8.** **Alternate Operating Scenarios:** None

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

### EP09 (EU09) Ink Jet Printing

**Description:** Various ink jet printers using solvent-based inks for printing product identification.

Maximum continuous rating: 1.22 lbs/hr
Control Equipment: None

**APPLICABLE REGULATIONS:** None

1. **Operating Limitations:** The usage rate of all VOC and HAP containing materials shall be restricted so the emission limitations as set forth in Section D of this permit are not exceeded.

2. **Emission Limitations:** There are no individual VOC or HAP emission limits for the affected facilities. Emission limitations are source wide, as given in Section D of this permit.

3. **Testing Requirements:** None

4. **Specific Monitoring Requirements:** The permittee shall monitor solvent usage for the purpose of demonstrating compliance with source wide emission limitations.

5. **Specific Recordkeeping Requirements:** The permittee shall keep records of all solvent containing materials used during each month including all inks, additives and clean up solvents. The records shall contain the amount of each material used and the VOC and HAP content of each material used.

6. **Specific Reporting Requirements:** The permittee shall report VOC and HAP emissions as part of the semiannual reporting as required in Section F (5) & (6) of this permit.

7. **Specific Control Equipment Operating Conditions:** None

8. **Alternate Operating Scenarios:** None

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

**EP04 (401, 402) Two (2) Natural Gas Fired Boilers**

**Description:** (2) American Standard, Kewanee Fire Tube Boilers, Natural Gas-fired
Maximum continuous rating: 14.645 MMBtu/hr (each)
Installed: 1969
Control Equipment: None

**APPLICABLE REGULATIONS:**
**401 KAR 61:015—Existing indirect heat exchangers.** Applicable per Section 2 (1); "Affected facility" means an indirect heat exchanger having a heat input capacity of more than one (1) million BTU per hour commenced before April 9, 1972.

**1. Operating Limitations:** None

**2. Emission Limitations:** 401 KAR 61:015

A. Section 4(1) limits emissions of particulate matter to 0.634 pounds per million BTU actual heat input.
**Compliance Demonstration Method:** The source is considered to be in compliance when the boilers are firing natural gas.

B. Section 4(3) limits visible emissions from each stack to less than 40% opacity except:
4(3)(c) For emissions from an indirect heat exchanger during building a new fire for the period required to bring the boiler up to operating conditions provided the method used is that recommended by the manufacturer and the time does not exceed the manufacturer's recommendations.
**Compliance Demonstration Method:** The source is considered to be in compliance when the boilers are firing natural gas.

C. Section 5(1)(a) limits emissions of sulfur dioxide to 5.24 pounds per million BTU actual heat input.
**Compliance Demonstration Method:** The source is considered to be in compliance when the boilers are firing natural gas.

**3. Testing Requirements:** Testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulations 401 KAR 59:005 Section 2(2) and 401 KAR 50:045 Section 4.

**4. Specific Monitoring Requirements:** None

**5. Specific Recordkeeping Requirements:** None

**6. Specific Reporting Requirements:** None

**7. Specific Control Equipment Operating Conditions:** None

**8. Alternate Operating Scenarios:** None

## SECTION B - EMISSION POINTS, EMISSION UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

**EP04 (403) One (1) Natural Gas Fired Boiler**

**Description:** Cleaver Brooks, Fire Tube Package Boiler, Natural gas-fired
Maximum continuous rating: 14.645 MMBtu/hr
Installed: 1983
Control Equipment: None

**APPLICABLE REGULATIONS:**

**401 KAR 59:015—New indirect heat exchangers.** Applicable per Section 2 (1); "Affected facility" means an indirect heat exchanger having a heat input capacity of more than one (1) million BTU per hour commenced on or after April 9, 1972.

**1. Operating Limitations:** None

**2. Emission Limitations:** 401 KAR 59:015

A. Section 4(1)(c) limits emissions of particulate matter to 0.395 pounds per million BTU actual heat input.

**Compliance Demonstration Method:** The source is considered to be in compliance when the boiler is firing natural gas.

B. Section 4(2) limits visible emissions from each stack to less than 20% opacity except:

4(2)(b) A maximum of 40% opacity shall be permissible for not more than 6 consecutive minutes in any 60 consecutive minutes during cleaning the firebox or blowing soot.

4(2)(c) For emissions from an indirect heat exchanger during building a new fire for the period required to bring the boiler up to operating conditions provided the method used is that recommended by the manufacturer and the time does not exceed the manufacturer's recommendations.

**Compliance Demonstration Method:** The source is considered to be in compliance when the boiler is firing natural gas.

C. Section 5(1)(c) limits emissions of sulfur dioxide to 1.634 pounds per million BTU actual heat input.

**Compliance Demonstration Method:** The source is considered to be in compliance when the boiler is firing natural gas.

**3. Testing Requirements:** Testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulations 401 KAR 59:005 Section 2(2) and 401 KAR 50:045 Section 4.

**4. Specific Monitoring Requirements:** None

**5. Specific Recordkeeping Requirements:** None

**6. Specific Reporting Requirements:** None

**7. Specific Control Equipment Operating Conditions:** None

**8. Alternate Operating Scenarios:** None

## SECTION C - INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to 401 KAR 52:020, Section 6. While these activities are designated as insignificant the permittee must comply with the applicable regulation and some minimal level of periodic monitoring may be necessary.

| Description | Generally Applicable Regulation |
|---|---|
| 1. EP-06 (EU-06) Fiber Operation (Thermal bonded) Card Line | 401 KAR 59:010 |
| 2. Tank Farm – Located indoors<br>Tanks #1-8, #10, (13,000 gallons each) (1969)<br>Tanks #13-17, #22, #23, (13,000 gallons each) (1999)<br>Tank #9, (TDI tank 3; 13,000 gal.)<br>Tanks #11 and #12, (TDI tanks 1 and 2; 10,000 gal. each)<br>Tank #18, (7,500 gal.)<br>Tank #19, (10,000 gal.)<br>Tank #20, (9,100 gal.)<br>Tanks, (2) Off-spec polyol (10,300 gal. each)<br>Tank, Off-spec polyol (10,000 gal.)<br>Tank, Off-spec TDI (10,300 gal.)<br>Tank, Large Binder Tank (10,300 gal.)<br>Tank, Small Binder Tank (2,100 gal.) | N/A |
| 3. Building 3 Tanks<br>EVCL Resin Tank (8,000 gal.) – Bldg. 3<br>Vinyl Acetate Tank (8,000 gal.) – Bldg. 3<br>Wastewater Tank (8,000 gal.) – Bldg. 3<br>Wastewater Tank (2,300 gal.) – Bldg. 3 | N/A |
| 4. Truck Shop 15W40 Oil Tank (550 gal.) | N/A |
| 5. East side gasoline tank (300 gal.) | N/A |
| 6. East side propane tank (500 gal.) | N/A |
| 7. East side Liquid $CO_2$ Tank (60,000 lbs.) | N/A |
| 8. Outdoor Diesel Tank (200,000 gal.) (1977) | N/A |
| 9. East side Tank #1 (400,000 gal.) (1975) | N/A |
| 10. East side Tank #2 (400,000 gal.) (1975) | N/A |
| 11. East side Oil Tank (1,100 gal.) (1992) | 401 KAR 59:050 |
| 12. Fire fighting water pump engine | N/A |
| 13. Fire fighting pump house heater | N/A |
| 14. Laboratory fume hoods (2) | N/A |
| 15. Hot Oil Laminator | N/A |
| 16. Hot Knife Operation | N/A |
| 17. Truck Shop | N/A |

## SECTION D – SOURCE WIDE EMISSION LIMITATIONS, MODELING AND TESTING REQUIREMENTS

1. As required by Section 1b of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26; compliance with annual emissions and processing limitations contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months.

2. VOC and HAP emissions, measured by applicable reference methods, or an equivalent or alternative method specified in 40 C.F.R. Chapter I, or by a test method specified in the state implementation plan shall not exceed the respective limitations specified herein.

3. **Emission Limitations:**

**A. HAP Limitations**

(1) Sourcewide emissions of any individual HAP shall not exceed 9 tons per rolling 12 month total.

**Compliance Demonstration Method:**

Monthly HAP species emissions = Σ HAP emissions from Virgin Foam Line
+ Σ HAP emissions from Rebond
+ Σ HAP emissions from adhesive usage, antimicrobial agents, misc. operations

When the given HAP emissions from each month are added to the previous eleven (11) months the new rolling total shall not exceed 9 tons.

(2) Sourcewide total HAP emissions shall not exceed 22.5 tons per rolling 12 month total.

**Compliance Demonstration Method:**

When the total HAP emissions from each month are added to the previous eleven (11) months the new rolling total shall not exceed 22.5 tons.

**B. VOC Limitations**

(1) Sourcewide emissions of VOC shall not exceed 225 tons per rolling 12 month total.

**Compliance Demonstration Method:**

Monthly VOC emissions = Σ VOC emissions from Virgin Foam Line
+ Σ VOC emissions from Rebond
+ Σ VOC emissions from adhesive usage, antimicrobial agents, misc. operations

When the VOC emissions from each month are added to the previous eleven (11) months the new rolling total shall not exceed 225 tons.

## SECTION D – SOURCE WIDE EMISSION LIMITATIONS, MODELING AND TESTING REQUIREMENTS (CONTINUED)

4. **Recordkeeping:**

The permittee shall keep monthly records showing the amount of each HAP or HAP containing material used and a summary of the total HAPs emitted during the month. Each month calculate and record a new 12-month rolling total representing emissions from the most recent year.

5. **Reporting:**

The permittee shall submit a **semiannual** report to the Division's Bowling Green Field Office which shows the total amount of HAP and HAP containing materials used at the source. The report shall contain a monthly summary of each HAP emitted from these materials, as well as a rolling 12-month total for each pollutant. Sample calculations shall be included. This semiannual report shall be submitted as part of the semiannual reporting as required by **Section F (5 & 6)** and the annual compliance certification required in **Section F.9**.

## SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS

1. Pursuant to 401 KAR 50:055, Section 2(5), at all times, including periods of startup, shutdown and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

## SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS

1. Pursuant to Section 1b (IV)1 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26, when continuing compliance is demonstrated by periodic testing or instrumental monitoring, the permittee shall compile records of required monitoring information that include:
    a. Date, place as defined in this permit, and time of sampling or measurements;
    b. Analyses performance dates;
    c. Company or entity that performed analyses;
    d. Analytical techniques or methods used;
    e. Analyses results; and
    f. Operating conditions during time of sampling or measurement.

2. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality [Sections 1b(IV) 2 and 1a(8) of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

3. In accordance with the requirements of 401 KAR 52:020 Section 3(1)h the permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times:
    a. Enter upon the premises to inspect any facility, equipment (including air pollution control equipment), practice, or operation;
    b. To access and copy any records required by the permit:
    c. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements.

    Reasonable times are defined as during all hours of operation, during normal office hours; or during an emergency.

4. No person shall obstruct, hamper, or interfere with any Cabinet employee or authorized representative while in the process of carrying out official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

5. Summary reports of any monitoring required by this permit, shall be submitted to the Regional Office listed on the front of this permit at least every six (6) months during the life of this permit, unless otherwise stated in this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the emission unit was not in operation [Section 1b (V )1 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

## SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

6. The semi-annual reports are due by January 30th and July 30th of each year. All reports shall be certified by a responsible official pursuant to 401 KAR 52:020 Section 23. If continuous emission and opacity monitors are required by regulation or this permit, data shall be reported in accordance with the requirements of 401 KAR 59:005, General Provisions, Section 3(3). All deviations from permit requirements shall be clearly identified in the reports.

7. In accordance with the provisions of 401 KAR 50:055, Section 1 the owner or operator shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows:
    a. When emissions during any planned shutdowns and ensuing startups will exceed the standards, notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
    b. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards, notification shall be made as promptly as possible by telephone (or other electronic media) and shall be submitted in writing upon request.

8. The owner or operator shall report emission related exceedances from permit requirements including those attributed to upset conditions (other than emission exceedances covered by Section F.7. above) to the Regional Office listed on the front of this permit within *30 days*. Deviations from permit requirements, including those previously reported under F.7 above, shall *be included in the semiannual report required by F.6* [Section 1b (V) 3, 4. of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

9. Pursuant to 401 KAR 52:020, Permits, Section 21, the permittee shall annually certify compliance with the terms and conditions contained in this permit, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an alternative approved by the regional office) to the Regional Office listed on the front of this permit and the U.S. EPA in accordance with the following requirements:
    a. Identification of the term or condition;
    b. Compliance status of each term or condition of the permit;
    c. Whether compliance was continuous or intermittent;
    d. The method used for determining the compliance status for the source, currently and over the reporting period.
    e. For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.

## SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

f. The certification shall be postmarked by January 30th of each year. Annual compliance certifications shall be mailed to the following addresses:

Division for Air Quality
Bowling Green Regional Office
1508 Western Avenue
Bowling Green, KY 42104

U.S. EPA Region 4
Air Enforcement Branch
Atlanta Federal Center
61 Forsyth St.
Atlanta, GA 30303-8960

Division for Air Quality
Central Files
803 Schenkel Lane
Frankfort, KY 40601

10. In accordance with 401 KAR 52:020, Section 22, the permittee shall provide the Division with all information necessary to determine its subject emissions within thirty (30) days of the date the KYEIS emission survey is mailed to the permittee.

11. Results of performance test(s) required by the permit shall be submitted to the Division by the source or its representative within forty-five days or sooner if required by an applicable standard, after the completion of the fieldwork.

## SECTION G - GENERAL PROVISIONS

(a) General Compliance Requirements

1. The permittee shall comply with all conditions of this permit. Noncompliance shall be a violation of 401 KAR 52:020 and of the Clean Air Act and is grounds for enforcement action including but not limited to termination, revocation and reissuance, revision or denial of a permit [Section 1a, 3 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020 Section 26].

2. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance, shall not stay any permit condition [Section 1a, 6 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

3. This permit may be revised, revoked, reopened and reissued, or terminated for cause in accordance with 401 KAR 52:020, Section 19. The permit will be reopened for cause and revised accordingly under the following circumstances:
   a. If additional applicable requirements become applicable to the source and the remaining permit term is three (3) years or longer. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if compliance with the applicable requirement is not required until after the date on which the permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to 401 KAR 52:020, Section 12;
   b. The Cabinet or the U. S. EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements;
   c. The Cabinet or the U. S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit;

   Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable. Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the Division, at least thirty (30) days in advance of the date the permit is to be reopened, except that the Division may provide a shorter time period in the case of an emergency.

4. The permittee shall furnish information upon request of the Cabinet to determine if cause exists for modifying, revoking and reissuing, or terminating the permit; or to determine compliance with the conditions of this permit [Section 1a, 7,8 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

5. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such facts or corrected information to the permitting authority [401 KAR 52:020, Section 7(1)].

## SECTION G - GENERAL PROVISIONS (CONTINUED)

6. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit [Section 1a, 14 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

7. The permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance [Section 1a, 4 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

8. Except for requirements identified in this permit as state-origin requirements, all terms and conditions shall be enforceable by the United States Environmental Protection Agency and citizens.[Section 1a, 15 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

9. This permit shall be subject to suspension if the permittee fails to pay all emissions fees within 90 days after the date of notice as specified in 401 KAR 50:038, Section 3(6) [Section 1a, 10 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

10. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance [401 KAR 52:020, Section 11(3)(b)].

11. This permit does not convey property rights or exclusive privileges [Section 1a, 9 of the *Cabinet Provisions and Procedures for Issuing Title V Permits* incorporated by reference in 401 KAR 52:020, Section 26].

12. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Kentucky Cabinet for Environmental and Public Protection or any other federal, state, or local agency.

13. Nothing in this permit shall alter or affect the authority of U.S. EPA to obtain information pursuant to Federal Statute 42 USC 7414, Inspections, monitoring, and entry [401 KAR 52:020, Section 11(3)(d)].

14. Nothing in this permit shall alter or affect the authority of U.S. EPA to impose emergency orders pursuant to Federal Statute 42 USC 7603, Emergency orders [401 KAR 52:020, Section 11(3)(a)].

15. This permit consolidates the authority of any previously issued PSD, NSR, or Synthetic Minor source preconstruction permit terms and conditions for various emission units and incorporates all requirements of those existing permits into one single permit for this source.

## SECTION G - GENERAL PROVISIONS (CONTINUED)

16. Pursuant to 401 KAR 52:020, Section 11, a permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of issuance. Compliance with the conditions of a permit shall be considered compliance with:
    a. Applicable requirements that are included and specifically identified in the permit and
    b. Non-applicable requirements expressly identified in this permit.

(b) Permit Expiration and Reapplication Requirements

1. This permit shall remain in effect for a fixed term of five (5) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division [401 KAR 52:020, Section 12].

2. The authority to operate granted shall cease to apply if the source fails to submit additional information requested by the Division after the completeness determination has been made on any application, by whatever deadline the Division sets [401 KAR 52:020 Section 8(2)].

(c) Permit Revisions

1. A minor permit revision procedure may be used for permit revisions involving the use of economic incentive, marketable permit, emission trading, and other similar approaches, to the extent that these minor permit revision procedures are explicitly provided for in the SIP or in applicable requirements and meet the relevant requirements of 401 KAR 52:020, Section 14(2).

2. This permit is not transferable by the permittee. Future owners and operators shall obtain a new permit from the Division for Air Quality. The new permit may be processed as an administrative amendment if no other change in this permit is necessary, and provided that a written agreement containing a specific date for transfer of permit responsibility coverage and liability between the current and new permittee has been submitted to the permitting authority within ten (10) days following the transfer.

(d) Construction, Start-Up, and Initial Compliance Demonstration Requirements

No construction authorized by this permit

(e) Acid Rain Program Requirements

1. If an applicable requirement of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) is more stringent than an applicable requirement promulgated pursuant to Federal Statute 42 USC 7651 through 7651o (Title IV of the Act), both provisions shall apply, and both shall be state and federally enforceable.

## SECTION G - GENERAL PROVISIONS (CONTINUED)

(f) Emergency Provisions

1. Pursuant to 401 KAR 52:020 Section 24(1), an emergency shall constitute an affirmative defense to an action brought for the noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or relevant evidence that:
   a. An emergency occurred and the permittee can identify the cause of the emergency;
   b. The permitted facility was at the time being properly operated;
   c. During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
   d. Pursuant to 401 KAR 52:020, 401 KAR 50:055, and KRS 224.01-400, the permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division when emission limitations were exceeded due to an emergency. The notice shall include a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
   e. This requirement does not relieve the source of other local, state or federal notification requirements.

2. Emergency conditions listed in General Condition (f)1 above are in addition to any emergency or upset provision(s) contained in an applicable requirement [401 KAR 52:020, Section 24(3)].

3. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof [401 KAR 52:020, Section 24(2)].

(g) Risk Management Provisions

1. The permittee shall comply with all applicable requirements of 401 KAR Chapter 68, Chemical Accident Prevention, which incorporates by reference 40 CFR Part 68, Risk Management Plan provisions. If required, the permittee shall comply with the Risk Management Program and submit a Risk Management Plan to:

   RMP Reporting Center
   P.O. Box 1515
   Lanham-Seabrook, MD 20703-1515.

2. If requested, submit additional relevant information to the Division or the U.S. EPA.

(h) Ozone depleting substances

1. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
   a. Persons opening appliances for maintenance, service, repair, or disposal shall comply with the required practices contained in 40 CFR 82.156.

## SECTION G - GENERAL PROVISIONS (CONTINUED)

b. Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment contained in 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.

d. Persons disposing of small appliances, MVACs, and MVAC-like appliances (as defined at 40 CFR 82.152) shall comply with the recordkeeping requirements pursuant to 40 CFR 82.166

e. Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.

f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

2. If the permittee performs service on motor (fleet) vehicle air conditioners containing ozone-depleting substances, the source shall comply with all applicable requirements as specified in 40 CFR 82, Subpart B, *Servicing of Motor Vehicle Air Conditioners*.

## SECTION H - ALTERNATE OPERATING SCENARIOS

None

## SECTION I - COMPLIANCE SCHEDULE

None